

& associates, inc.

former GM Linden NJD 002 186 690

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March 13, 2012

Ms. Judith Enck
Regional Administrator
U.S. EPA Region 2
290 Broadway
New York, NY 10007-1866

RE: Addendum to February 3, 2012 Notification of Limited Concrete Slab Removal and PCB Remediation Waste Disposal Pursuant to 40 CFR 761.61(a) at the Former General Motors Corporation (GM) Linden Assembly Plant, 1016 West Edgar Road, Linden, Union County, New Jersey 07036, EPA Site ID No. NJD002186690; Hull Document No. DUK059.701.0105.

Dear Ms. Enck:

Hull & Associates, Inc. (Hull), on behalf of Linden Development, LLC (Linden Development), previously provided a notification of self-implementing cleanup and disposal of a limited amount of concrete originating from a floor slab at the Former GM Linden Assembly Plant (Site). The notification was dated February 3, 2012 and was provided pursuant to 40 CFR 761.61(a)(3).

U.S. EPA subsequently reviewed the notification and provided comments in a letter dated March 8, 2012. The March 8, 2012 comment letter was provided by Mr. John Gorman, Chief of U.S. EPA Region 2 Pesticides & Toxic Substances Branch. Mr. Bill Dennis (Hull) and Ms. Vivian Chin (from Mr. Gorman's Office) discussed the comments via telephone correspondence on March 13, 2012. This addendum letter provides the additional information requested by EPA to follow-up on the March 8, 2012 comment letter and phone discussion from March 13, 2012. Pursuant to our discussion with Ms. Chin, we have addressed the addendum letter to your office and are concurrently sending copies to Mr. Gorman and Ms. Chin.

For ease of reference, EPA's comments are provided in bold italics below with our response immediately following.

Comment: The notification does not address verification sampling as is required by 40 CFR § 761.61(a)(6). While the contaminated portion of the slab is to be removed, there must be a demonstration that the subsurface area was not impacted by PCBs.

As requested, Hull will collect samples of the subgrade material following removal of the concrete slab. The sampling will be conducted pursuant to 40 CFR § 761.61(a)(6) and subpart O.

In addition, the original slab sampling summarized in the February 3, 2012 notification included collection of a deep concrete sample immediately adjacent to the surface sample displaying the highest concentration of PCBs. The deeper sample was collected from a depth of 3 to 6 inches to determine the depth of impact within the slab. While the surface sample at this location

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displayed PCBs at 103 mg/kg, the deeper sample displayed a concentration of 0.036 mg/kg. This indicates that the PCB impact was limited to the slab's surface and did not penetrate deeper into the concrete slab.

Comment: 40 CFR §761.61(a)(3) requires a written certification signed by the owner of the property where the cleanup site is located and the party conducting the cleanup. You have provided an owner certification, however, please provide a certification by the party conducting the cleanup.


As requested, a certification signed by Hull is provided in Attachment A to supplement the owner certification provided previously.

Comment: Please provide confirmation that the notification and certification has also been provided to the Director of the county or local environmental protection agency, per 40 CFR §761.61(a)(3).

On March 13, 2012, Hull forwarded a copy of the February 3, 2012 notification letter to Ms. Mary Purves – Chair of the City of Linden's Environmental Commission. Mr. Bill Dennis (Hull) also contacted Ms. Purves via telephone on March 13, 2012 and provided context surrounding that notification letter. Ms. Purves has also been copied on this addendum submittal.

We very much appreciate EPA's assistance to date and trust that this addendum provides the remaining required information. If you have any questions or require additional information, please feel free to contact the undersigned at (412) 446-0315.

Sincerely,



Bill Dennis
Senior Project Manager

Attachment

cc: Mr. John Gorman, Chief – U.S. EPA Region 2 Pesticides and Toxic Substances Branch
Ms. Vivian Chin – U.S. EPA Region 2 Pesticides and Toxic Substances Branch
Gary Greulich - NJDEP Case Manager
Clifford Ng – U.S. EPA PM
Jim Haklar -- U.S. EPA Regional PCB Coordinator
Ms. Mary Purves – City of Linden Environmental Commission
Brian Strohl -- Linden Development (electronic submittal)

ATTACHMENT A

CERTIFICATION BY PARTY CONDUCTING CLEANUP

In accordance with 40CFR 761.61(a)(3)(E), the characterization information, including the sampling plan, sample collection procedures, sample preparation, extraction procedures, and chemical analyses conducted at the Former GM Linden Assembly Plant located at 1013 West Edgar Road in Linden, New Jersey, are on file at the locations listed below and are available for U.S. EPA inspection upon request.

Linden Development LLC
c/o Duke Realty Corporation
5600 Blazer Parkway, Suite 100
Dublin, Ohio 43017

Hull & Associates, Inc.
300 Business Center Drive
Suite 320
Pittsburgh, Pennsylvania 15205

New Jersey Department of Environmental Protection
Site Remediation - North Field Office
7 Ridgedale Ave.
Cedar Knolls, NJ 07927

Signature W.H. Dennis
Name BILL DENNIS
Title SR. PROJECT MANAGER
Date 3/13/12